



**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the Matter of: (   
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 Broadband Management and Consumer ( GN Docket Nos. 09-47, 09-51, 9-137   
 Transparency of Fixed Residential (   
 and Small Business Services in the (   
 United States (

**REPLY COMMENTS BY TRGiSKY  
NBP Public Notice # 24**

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## **INTRODUCTION**

TRGiSKY respectfully submits its reply comments in response to the FCC's request for comments on sought on broadband measurement and consumer transparency of fixed residential and small business services in the United States NBP Public Notice # 24 GN Docket Nos. 09-47, 09-51, 09-137. TRGiSKY, Inc. is a market research, analytics and consulting firm. Founded in 1984, TRGiSKY, headquartered in Laurel, MD, is a constituent company of TRG Holdings headquartered in Washington, D.C.

### **A. Response to Measurement of Fixed Services**

#### ***2c If actual speeds are tracked, how should they be measured and reported?***

TRGiSKY recommends an innovative approach that is efficient and accurate that continually monitors connection speed. With the use a consumer panel, participants with internet access will download our software that will allow us to monitor their speed of connection. The software program has been tested. It is non-intrusive and downloads quickly. Therefore, the solution offers a turnkey data collection mechanism while reducing project expense and typical accuracy issues. The net result is that TRGiSKY can provide the FCC with an extremely accurate broadband map for the entire U.S complete with drill-down functionality. The full data set would be available online to support ad hoc analysis beyond the customized reporting.

#### ***2d. If quality of service is to be tracked, how should it be measured and reported?***

Leveraging the consumer panel that will allow for continuous measurement of connection speeds, consumers would be surveyed to solicit perceptions of the quality of service. Reporting of quality of service would be detailed based on technology, geography, internet

usage (e.g., when gaming, browsing, etc.), demographics, etc. The full data set would be available online to support ad hoc analysis beyond the customized reporting.

**3a     *What technology approaches should be used to measure Fixed Services?***

TRGiSKY recommends an innovative approach that is efficient and accurate that continually monitors connection speed. With the use of a screened, opt-in consumer panel, participants with internet access will download our software that will allow us to monitor their speed of connection. The software program has been tested. It is non-intrusive and downloads quickly. Therefore, the solution offers a turnkey data collection mechanism while reducing project expense and typical accuracy issues.

**3b.     *How should the technology approach be composed (customer panels vs. random samples vs. specific geographies, etc)?***

We propose to recruit a representative sample of consumers who are broadband and dial up subscribers as well as consumers without internet access. Recruiting consumers who have dial-up service and consumers without internet access will allow the FCC to 1) measure migration, adoption and defection behaviors and 2) will allow the FCC to ensure the panel is most representative of the fixed service population over time. Panel size would be dependent on reporting and accuracy requirements.

**4.     *Who should host, audit and track this measurement?***

A third party led initiative with FCC or third party auditing ensures objectivity, transparency, consistency of reporting. As a third party, TRGiSKY would measure and report actual speeds in a consistent fashion that would allow for meaningful, longitudinal analysis and ensure an apples to apples comparison across providers and fixed service types.

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**5a. What are the benefits (e.g., transparency, increased data, network comparability, etc.)?**

The solution TRGiSKY recommends provides the following key benefits in terms of measurement of actual speeds and quality of service:

- Consistent and accurate reporting available in real time via secure online reporting site;
- Participants are from a robust panel of internet households, non- internet household and potentially businesses supporting granular analysis
- Provides an accurate picture of current landscape and offer time-series to identify emerging trends
- Focus goes beyond descriptive behaviors to examine attitudes, usage, available service types, connections, etc.
- Assesses the relationship of mobile phone internet access to regular home broadband connections
- Able to quantify the impact of future technological and social trends and what impact they will have on consumer behavior or internet needs

**5b. What are the costs (e.g., hardware costs, usage of the network, consumer hassle, etc.)?**

The solution cost is largely a function of the reporting and accuracy requirements. That said, it is likely a fraction of traditional survey research costing.

**5c. What are the privacy/security considerations?**

The program is entirely secure as no private information is monitored or captured. Participants are made aware of the program functionality upon recruitment. In addition, a toll-free number would be available to participants to call at any time for questions or support.

**6a. How can we ensure rural geographies, including tribal lands, and smaller providers are accurately represented?**

TRGiSKY's solution would ensure a representative sample in the recruitment phase and would continuously validate the panel and adjust the panel over time as appropriate.